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TRANSMITTAL LETTER REGARDING THE DRAFT SAMPLING AND ANALYSIS PLAN
STUDY AREA SCREENING EVALUATION CATEGORY 3 AREAS OF CONCERN TANK
FARMS 2, 3, AND 4 NS NEWPORT RI
04/12/2016
RESOLUTION CONSULTANTS

April 12, 2016

U.S. Environmental Protection Agency, Region 1
Federal Facilities Superfund Section
Attn: Ms. Jane Dolan
5 Post Office Square, Suite 100
Mail Code: OSRR07-3
Boston, MA 02109-3912

Rhode Island, Department of Environmental Management
Office of Waste Management
Attn: Ms. Pamela Crump
235 Promenade Street
Providence, RI 02908-5767

RE: Draft Sampling and Analysis Plan
Study Area Screening Evaluation (SASE)
Category 3 Areas of Concern (AOCs)
Tank Farms 2, 3, and 4
Naval Station (NAVSTA) Newport, Rhode Island

Dear Ms. Dolan and Ms. Crump:

On behalf of the Naval Facilities Engineering Command (NAVFAC), Mid-Atlantic (MIDLANT), Resolution Consultants is pleased to provide this draft Sampling and Analysis Plan (SAP) to implement a field investigation in support of a Study Area Screening Evaluation (SASE) of selected Areas of Concern (AOCs) within Tank Farm 2, 3, and 4 at Naval Station (NAVSTA) Newport, Rhode Island.

For context, the SASE phase of study is required for AOCs per the Federal Facility Agreement (FFA) for NAVSTA Newport, which was developed by the Navy, Environmental Protection Agency (EPA), and Rhode Island Department of Environmental Management (RIDEM). Per the FFA, the SASE is intended to provide the basis for a determination that either (1) a remedial investigation and feasibility study (RI/FS) is to be performed for the study area, or (2) the study area does not pose a threat or potential threat to human health and the environment and therefore, should be removed from further study under the FFA. For the NAVSTA Newport tank farms, the Navy, EPA, and RIDEM have further categorized the AOCs using the following system.

- Category 1 (Cat 1) – Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) regulated areas. These AOCs are the result of a release/suspected release of a CERCLA hazardous substance(s).



- Category 2 (Cat 2) – RIDEM Underground Storage Tank (UST) regulated areas. These AOCs are the result of petroleum contamination from fuel storage operations and distribution.
- Category 3 (Cat 3) – Additional areas of concern. These AOCs were identified for desktop review to determine whether an investigation is warranted. For those AOCs that warrant investigation, the following actions are anticipated.
 - Prepare a SAP for field investigation (enclosed).
 - Conduct field program.
 - Prepare an SASE Report with recommendations to assign the investigated AOCs to Category 1 (CERCLA), Category 2 (RIDEM UST), or conclude that No Further Action (NFA) is warranted.

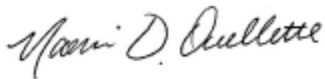
Potential Cat 3 AOCs at the tank farms were identified through aerial photography during the Site Investigation and Remedial Action Report (SIRAR) activities completed between 2004 through 2005, as well as in various comment documents from RIDEM and USEPA on that report. AOCs were cataloged by the Navy and a desktop review was conducted to determine which AOCs required additional investigation. A site inspection was conducted on 4/2/14 with the Navy, EPA, and RIDEM to field verify the location and existence of the potential Cat 3 AOCs. The results of the inspection were distributed to the team on 4/15/14 with a follow-up conference call on 8/6/14. The result was team concurrence on the following Cat 3 AOCs to investigate at Tank Farms 2, 3 and 4.

- Tank Farm 2
 - Former Ground Scars
 - Former Public Works Garage Complex (Former Buildings 82, 240, 236, 239), and
 - Former Substation 19 (Building 218)
- Tank Farm 3
 - Former Valve House (Building 228)
 - Stripper Valve Pit (Chamber 229)
- Tank Farm 4
 - Former Cable Tap-off Structure

The Cat 3 AOCs included for field investigation in this SAP (enclosed) are presented together under each worksheet (rather than individual worksheets for each AOC) to streamline and simplify the format and flow of the SAP. To maintain the FFA schedule for this site, regulatory comments are requested on or before May 23, 2016.

An FTP download can also be provided upon request. Please provide comments and suggestions to Naomi Ouellette, Task Order Manager (401-854-2813), Mark Kauffman, Activity Coordinator (978-905-2262), and/or Jim Gravette, Navy RPM (757-341-2014). We look forward to working with you on this program.

Sincerely,



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